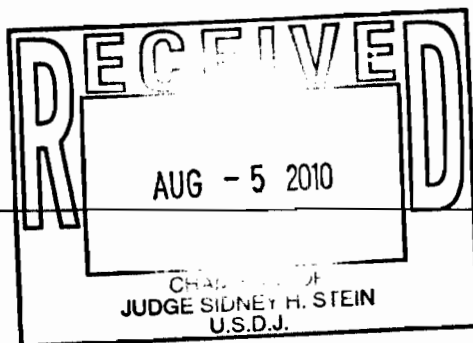
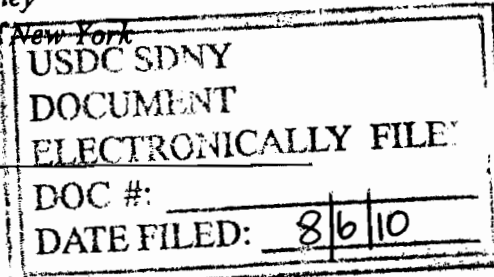


U.S. Department of Justice

United States Attorney
Southern District of New YorkThe Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 5, 2010

BY FAX

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENCLOSED

Re: United States v. Mondher Bejaoui,
10 Cr. 553 (SHS)

Dear Judge Stein:

The Government writes to request that the Court extend the deadline for the production of discovery in the above-referenced case by ten days and extend the deadline for any motions by the defendant for a corresponding period.

The Government had initially proposed thirty days for the production of discovery. The Government expects to produce approximately a thousand pages of discovery when that date arrives tomorrow. However, because many documents in the discovery materials required redaction and because coordinating the production of discovery among multiple investigative agencies has required extensive effort to avoid the production of many copies of the same documents, the Government requests ten days to produce remaining documents that have not yet been Bates stamped and appropriately redacted. (As the defendant objected to the Government's initial proposal of 30 days for discovery, the Government believes the defendant to object, a fortiori, to any extension.)

Hon. Sidney H. Stein
August 6, 2010
Page 2

If the Government's request for a ten-day extension is granted, the deadline for production of discovery would be Monday August 16, 2010, and the deadline for the filing of motions would be Friday September 17, 2010.¹

Conf. advised for Sept 8 to Sept 17 at 10 AM.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: *Rachel Kovner*

Rachel Kovner
Assistant United States Attorney
Tel.: (212) 637-2470

CC: Steven Kartagener, Esq. (By Fax)

SO ORDERED *8/6/10*

[Signature]
SIDNEY H. STEIN
U.S.D.J.

¹ Additionally, the Government advises the Court that it received today several boxes of bank records sent in response to a grand jury subpoena that had a response date of April 2010. The Government recognizes that its discovery obligations are continuing, and if at any time it determines that Rule 16 requires the disclosure of those records, it will provide them to the defendant at that time.